

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Paige Elizabeth Burrows,)	
)	
)	C.A. No.: _____
Plaintiff,)	
)	
vs.)	
)	
)	
Kyle Clyde Ryan and Anthony James Ryan Jr.,)	
)	
Defendants.)	
_____)	

**PLAINTIFF’S RESPONSES TO STANDARD INTERROGATORIES AND
STANDARD DIRECTIVES IN
COMPLIANCE WITH LOCAL CIVIL RULE 26.01**

The Plaintiff files the following response3s to standard interrogatories and directives in compliance with Rule 26.01 of the Local Civil Rules of Practice for the United States District Court for the District of South Carolina.

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE:

Plaintiff’s medical insurance carrier, Humana, 2 Pierce Place, Suite 1900, Itasca, IL 60143.

**The following medical providers may have a lien:
Alliance Spine Pain Center
3390 Peachtree Road NE
Atlanta, GA 30331**

**Key Health Medical Solutions, Inc.
30669 Russell Ranch Road, Suite 175
Westlake Village, CA 91362**

**Clemson Sports Medicine & Rehabilitation
Post Office Box 1844
Clemson, SC 29633**

**Oconee Memorial Hospital
298 Memorial Drive
Seneca, SC 29672**

Other medical providers that Plaintiff is currently unaware of may have liens. The extent of each medical provider's subrogation interests are unknown at this time.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiff is entitled to trial by jury. Plaintiff timely requested a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) and each publicly owned company of which the party owns ten percent or more of the outstanding shares.

RESPONSE: Not applicable.

D. State the basis for asserting your claim in the division in which it was filed.

RESPONSE: The subject incident occurred in this division. The Plaintiff is currently a citizen and resident of South Carolina. Defendants are citizens and residents of Maryland. The Plaintiff is permitted to bring this action on diversity grounds.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a

single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reasons would entail substantial duplication of labor if heard by different judges.

RESPONSE: This action is not related to any other matters filed in this District.

KOON COOK & WALTERS, LLC

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Columbia, South Carolina
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